

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

NOV 5 2015

Rain CII Carbon LLC
12187 East 950th Street
Robinson, Illinois 62454

ATTENTION:

Matt Taylor
Plant Manager

Amendment to Request to Provide Information Pursuant to the Clean Air Act

This amendment modifies Appendices B and D of the Request to Provide Information Pursuant to the Clean Air Act signed by the Director of the Air and Radiation Division on May 4, 2015 (May 4, 2015 Request to Provide Information). Except as specifically set forth herein, all provisions of the May 4, 2015 Request to Provide Information shall remain in full force and effect. Amended Appendices B and D specify the information that you must submit. You must send this information to us according to the schedule specified in these Appendices.

We are issuing this information request under Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Rain owns and operates an emission source at the Robinson, Illinois facility. We are requesting this information to determine whether your emissions source is complying with the Illinois State Implementation Plan, applicable CAA regulations, and the National Ambient Air Quality Standards.

Rain must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Rain must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix E to the May 4, 2015 Request to Provide Information, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards, and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix E to the May 4, 2015 Request to Provide Information provides additional information regarding the meaning and scope of the term "emissions data."

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

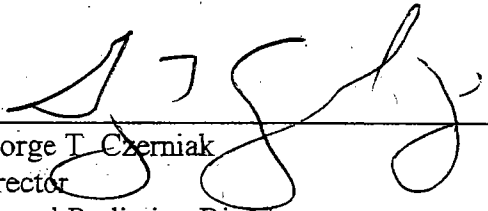
We may use any information submitted in response to this request in an administrative, civil, or criminal action.

Failure to comply fully with this information request may subject Rain to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Dakota Prentice at (312) 886-6761 or Daniel Schaufelberger at (312) 886-6814.

Date

11/5/15


George T. Czerniak
Director
Air and Radiation Division

Amended Appendix B

Rain CII Carbon LLC (Rain) must submit the following information requested for its facility located at 12187 East 950th Street, Robinson, Illinois (the Facility), pursuant to Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. Section 7414(a).

PM₁₀ Monitor and Siting

1. Rain shall install an ambient air monitor for particulate matter (PM) at its Facility.
2. Within *60 days* of receipt of this Amendment to the May 4, 2015 Request for Information, Rain shall submit the proposed monitoring site location for EPA review and approval prior to establishing the monitoring site. The proposal for the monitoring site location shall include a map showing the property lines of the Facility, the locations of nearby residences and industrial properties, and proposed location of the monitoring site. The monitor shall be placed in the prevailing downwind location. Rain shall submit an annual wind rose and four seasonal wind roses showing wind patterns as reported for the past five-years at the nearest available meteorological station.
3. Within *60 days* of EPA approval of the monitoring site location specified in Item 2, Rain shall install, operate, and maintain the ambient monitoring site at the Facility. The site shall contain a continuous Federal Equivalent Method (FEM) real-time PM₁₀ monitor.
4. The monitoring site and monitoring equipment shall conform with the following requirements:
 - a. The PM₁₀ real-time monitor shall meet all of the specifications of FRM/FEM monitors on this list; www.epa.gov/ttn/amtic/files/ambient/criteria/reference-equivalent-methods-list.pdf;
 - b. Rain shall follow all monitoring, siting, and quality assurance criteria in 40 CFR Part 58, Appendix E;
 - c. All data collected shall be consistent with units in the National Ambient Air Quality Standards for PM₁₀; and
 - d. A data logger shall be attached to the monitor to record readings from the continuous monitor.
5. Rain shall follow all monitoring, siting, and quality assurance criteria as detailed in 40 CFR Part 58, Appendix A "Quality Assurance Requirements for SLAMS, SPMs, and PSD Air Monitoring" and Appendix D "Network Design Criteria for Ambient Air Quality Monitoring."
6. The monitor shall be operated in accordance with operating procedures identified in the Quality Assurance Handbook for Air Pollution Measurement Systems "Volume I: A Field Guide to Environmental Quality Assurance" and "Volume II: Ambient Air Quality Monitoring Program."

7. Rain shall be responsible for all operation and maintenance associated with the PM10 monitor. Maintenance shall include, at a minimum, the replacement of any equipment and cleaning on a schedule specified in the manufacturer's maintenance manual.
8. Rain shall order and pay for any necessary replacement parts, accessories, maintenance, etc.
9. Monitoring shall take place for at least six months from the date of installation. If no 24-hour periods during which PM10 levels are equal to or greater than $150\mu\text{g}/\text{m}^3$ are detected at the monitor, Rain may discontinue operating the monitor. If there are any 24-hour periods during which PM10 levels are equal to or greater than $150\mu\text{g}/\text{m}^3$, Rain shall continue monitoring for an additional six months from the date of installation.

Wind Speed and Direction Monitoring

10. Rain shall monitor and record meteorological data by one of the following methods. In addition, Rain shall maintain and/or submit reports and records in accordance with the paragraphs 13-18, below.
 - a. Utilizing a local meteorological station, pre-approved by EPA, to correlate 1-hr and 24-hr ambient PM10 measurements with wind speed and wind direction data to determine source direction and the effects of wind speed on PM10 concentrations (e.g., a pollution wind rose that displays the pollution concentration and wind direction frequency); or
 - b. Install, operate, and maintain a meteorological tower at a location representative of local wind conditions within 60 days of approval of the PM10 monitoring location. At a minimum, the meteorological tower must continuously measure and record wind speed and wind direction at one-hour intervals throughout the entire ambient monitoring period. Rain shall correlate 1-hr and 24-hr ambient PM10 measurements with wind speed and wind direction data to determine source direction and the effects of wind speed on PM10 concentrations. The meteorological tower must also include calibrated ambient temperature and pressure instrumentation for purposes of determining corrected (actual) PM10 concentrations as recorded by the monitors.
 - i. With respect to the meteorological monitoring site, Rain shall follow the Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV: Meteorological Measurements Version 2.0 (Final) found at:
http://www.epa.gov/ttnamti1/files/ambient/met/Volume%20IV_Meteorological_Measurements.pdf.
 - ii. Rain shall be responsible for maintenance associated with the meteorological tower on a schedule specified in the manufacturer's maintenance manual. Rain shall order and pay for any necessary replacement parts, accessories, maintenance, etc.
11. The internal clocks of the PM10 analyzer, data logger, and the wind speed and wind direction data logger shall be synchronized to within 60 seconds of each other (local time and not adjusted for Daylight Savings Time) and shall be checked against a calibrated reference

clock at least once every 30 days. Instrument clocks that are more than 60 seconds from the reference clock shall be reset to within 60 seconds of the reference clock. Each of these inconsistencies and each reset time shall be noted in the study log.

General Requirements Applicable to All Requests

12. Within 30 days of EPA approval of the monitoring site, Rain shall submit a Quality Assurance Project Plan (QAPP) to EPA. The guidance document for writing a QAPP is "EPA Guidance for Quality Assurance Project Plans," EPA QA/G-5, EPA/600/R-02/009 - December 2002. The guidance is available at <http://www.epa.gov/QUALITY/qs-docs/g5-final.pdf>.
13. Rain shall provide EPA access to the monitoring site and respond to any inquiries regarding monitor siting, operations, or maintenance. In the event that an inspector or auditor identifies problems, Rain shall take appropriate corrective actions. Any changes made to monitor siting, operations, or maintenance shall be approved by EPA prior to the change.
14. Rain shall keep a daily log and monthly reports of the following information:
 - a. Each site visit and operator activities associated with the operation and maintenance of the ambient air monitor and/or meteorological station;
 - b. Any monitoring system downtime (date, time, duration, and reason) along with any corrective actions taken;
 - c. Any possible interferences observed by the operator such as nearby construction or demolition; and
 - d. Any calibration data provided by the manufacturer or performed by Rain.
15. Hourly data from the monitor shall be downloaded as ASCII comma-delimited files and provided to EPA on CD every month. The files should have a single "header" row, with all following rows being individual records, and all columns being a single variable according to the header row.
16. Monthly reports and data specified in Items 14 and 15 above shall be submitted to EPA within 14 days of the end of the month being reported.
17. Rain shall submit these monthly reports to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

and also submit the monthly reports via electronic mail to prentice.dakota@epa.gov.

Amended Appendix D

Within *90 calendar days* of the receipt of this request, Rain CII Carbon LLC (Rain) shall conduct stack testing at the Kiln #2 exhaust stack at its facility located at 12187 East 950th Street, Robinson, Illinois (the Facility) using procedures described at 40 C.F.R. Part 60, Subpart A, and as specified below:

1. Performance testing shall consist of stack testing in accordance with EPA Reference Methods 1 through 4 (stack gas characteristics), 6C (SO₂), and 5 (particulate matter) in 40 C.F.R. Part 60, Appendices A-1, A-2, A-3 and A-4 for three one hour tests at the Kiln #2 exhaust stack. The kiln shall be operated at conditions similar to those which Kiln #2 operated between January 9, 2015 and January 17, 2015. Specifically, the green petcoke feedrate should be set at 27.5 tons per hour (tph) and Rain should target the kiln primary air and secondary air flowrates to be the same as the flowrates between January 9, 2015 and January 17, 2015, i.e., an average of 115 standard cubic feet per minute (scfm) and 85 scfm, respectively.
2. As part of the SO₂ testing, additional process information should be acquired and submitted to EPA in the test report outlined in Item 4 below. The following information should be recorded during the 3 hour testing period for Kiln #2:
 - a. the green petcoke feed rate (tph);
 - b. the calcined petcoke production rate (tph);
 - c. the average sulfur content (weight %) of green petcoke entering the kiln; and
 - d. the average sulfur content (weight %) of the calcined petcoke produced by the kiln.
3. Provide notification of the intent to test to EPA no later than *30 calendar days* prior to testing. Notification must include the scheduled testing date and a proposed testing protocol that describes in detail the methods and procedures for testing. Rain must conduct the testing under a protocol approved in advance by EPA.
4. Submit a complete report of the emissions testing at Kiln #2 within *30 days* of completion of the tests. The report shall include the following, at a minimum:
 - a. Summary of Results
 - i. Results of the emission tests in parts per million (ppm) and pounds per hour;
 - ii. Process data related to determination of compliance;
 - iii. Discussion of test errors;
 - iv. Discussion of any deviations from the reference test methods; and
 - v. Production data, including primary and secondary air flowrates (scfm), during the tests.

- b. Facility Operations
 - i. Description of the process operation; and
 - ii. Hourly operating data for the days of the tests.
- c. Sampling and Analytical Procedures
 - i. Sampling port location(s) and dimensions of cross-section;
 - ii. Sampling point description, including labeling system;
 - iii. Brief description of sampling procedures, including equipment and diagram;
 - iv. Description of sampling procedures (planned and accidental) that deviated from any standard method;
 - v. Brief description of analytical procedures, including calibration;
 - vi. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
 - vii. Quality control/quality assurance procedures, tests, and results.
- d. Appendix
 - i. Complete results with example calculations;
 - ii. Raw field data (original, not computer printouts);
 - iii. Laboratory report, with signed chain-of-custody forms;
 - iv. Calibration procedures and results;
 - v. Raw process and control equipment data, signed by plant representative;
 - vi. Test log;
 - vii. Project participants and titles; and
 - viii. Related correspondence.

CERTIFICATE OF MAILING

I, Kathy Jones, certify that I sent an Amendment to the May 4, 2015 Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

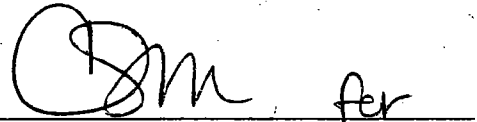
Matt Taylor
Plant Manager
Rain CII Carbon LLC
12187 East 950th Street
Robinson, Illinois 62454

I also certify that I sent a copy of the Amendment to the May 4, 2015 Request to Provide Information Pursuant to the Clean Air Act by First-Class Mail to:

Eric Jones, Manager
Bureau of Air, Compliance and Enforcement Section
Illinois Environmental Protection Agency
P.O. Box 19506
Springfield, Illinois 62794

Roy M. Harsh
Drinker Biddle & Reath, LLP
191 North Wacker Drive
Suite 3700
Chicago, IL 60606-1698

on the 5 day of November 2015.



Kathy Jones
Program Technician
AECAB, PAS

Certified Mail Receipt Number: 7014 2870 0001 9581 3543